

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GREGORY THOMAS BERRY, *et al.*,

Plaintiffs,

v.

**LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC., *et al.*,**

Defendants.

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Civil Action No. 3:11CV754

(Judge James R. Spencer)

**THE PARTIES' JOINT MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoon Saeed, Arthur B. Hernandez, Erika A. Godfrey, and Timothy Otten, individually and on behalf of all others similarly situated, (“Plaintiffs”), and Defendants LexisNexis Risk & Analytics Group, Inc., Seisint, Inc., and Reed Elsevier, Inc. (collectively “Defendants” and collectively the "Parties"), respectfully file this Joint Motion for Final Approval of Class Action Settlement. By this Motion, the Parties request an Order: (1) granting final approval of Settlement on the terms and conditions set forth in the Parties’ Settlement Agreement and the Court’s Order Granting Preliminary Approval (Dkt. No. 67; (2) finally certifying two classes, for settlement purposes only, pursuant to Fed. R. Civ. P. 23(b)(2) and Fed. R. Civ. P. 23(b)(3); (3) overruling all objections to the Settlement; (4) releasing the Defendants from all claims and dismissing with prejudice all claims of Class Members who did not timely exclude themselves from the Settlement; (5) retaining continuing jurisdiction over the settlement proceedings, to ensure the effectuation thereof in accordance with the Agreement and

Final Approval Order; and (6) granting related orders and findings as are set forth in the Proposed Final Approval Order, to be submitted by the Parties.

The grounds for this Motion are fully set forth in the concurrently filed Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement; Defendants' Memorandum in Support of the Parties' Joint Motion for Final Approval of the Proposed Settlement; and Plaintiffs' Responses to Objections to Class Action Settlement.

November 22, 2013

Respectfully submitted,

/s/ Leonard A. Bennett

Leonard A. Bennett

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CERTIFICATE OF SERVICE

I certify that on the 22nd day of November, 2013, I electronically filed the foregoing The Parties' Joint Motion for Final Approval of the Proposed Settlement with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service or electronic mail the document to the non-CM/ECF participants:

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